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October 5, 2015

BY ELECTRONIC FILING

The Honorable Gregory H. Woods
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: *Employees' Retirement System of the City of Montgomery v.*
JPMorgan Chase Bank, N.A., 1:15-cv-6002-GHW, and

Oakland Police & Fire Retirement System v.
JPMorgan Chase Bank, N.A., 1:15-cv-6007-GHW

Dear Judge Woods:

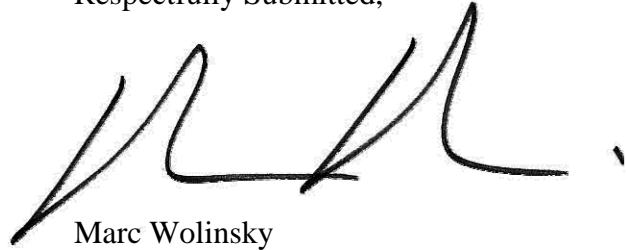
We represent defendant JPMorgan Chase Bank, N.A. ("JPMorgan") in the above-captioned, related actions along with Kelley, Drye & Warren LLP. As indicated in our August 28, 2015 letter (*Montgomery* Dkt. No. 5; *Oakland* Dkt. No. 14), the parties have now negotiated a stipulation and proposed order whereby defendants will accept service, the two cases will be consolidated, and a schedule will be set for the filing of a consolidated, amended complaint and defendants' motions to dismiss or other responses to such complaint. A copy of the stipulation and proposed order is attached as Exhibit A hereto.

The Honorable Gregory H. Woods
October 5, 2015
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Pursuant to Your Honor's individual practices and Rule 18.3 of the SDNY ECF Rules and Instructions, the parties are simultaneously with this letter submitting the stipulation and proposed order to the Orders and Judgments Clerk via email.

We are available to answer any questions the Court may have regarding this stipulation and proposed order.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'MW', followed by a comma. The signature is fluid and stylized.

Marc Wolinsky

cc: Counsel of Record (by ECF)
John Villa (counsel for Simpson Thacher) (by email)